

IN THE UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF DELAWARE

ISIDORE CORWIN AND BONNIE CORWIN  
(INFORMA PAUPERIS STATUS)

PLAINTIFFS,

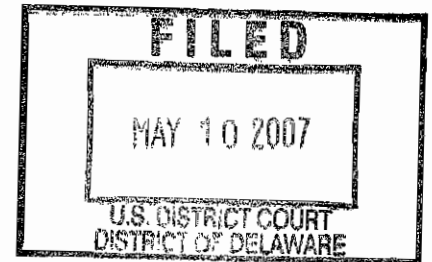
V.

B'NAI B'RITH SENIOR CITIZEN HOUSING, INC.,  
ET AL

DEFENDANTS.

CIVIL ACTION

NO. 07-CV-152-\*\*\*  
JURY TRIAL DEMANDED



PLAINTIFFS' MOTION TO AMEND COMPLAINT

BD scanned

PURSUANT TO LAR 15.1, PLAINTIFFS PETITION YOUR COURT TO AMEND THE ORIGINAL COMPLAINT. ATTACHED INFORMATION (AT EXHIBIT A & B) STATES THAT, IN RESPECT TO PLAINTIFFS' COMPLAINT IN NAMING THE DEFENDANTS, PLAINTIFFS HAVE KNOWLEDGE THAT THE WILMINGTON LODGE 470, B'NAI B'RITH, INC. IS ONE OF THE OWNERS OF THE B'NAI BRITH HOUSE (SUBJECT FACILITY NAMED IN THE COMPLAINT).

THEREFORE, PLAINTIFFS PETITION NOW TO ENJOIN THE AFOREMENTIONED LODGE CORPORATION TO THE DEFENDANTS LISTED IN THE ORIGINAL COMPLAINT, AND IN ORDER TO IMPOSE A VICARIOUS LIABILITY CLAIM AGAINST THE PROPOSED DEFENDANT REGARDING THE FAIR HOUSING ACT (42 USCS 3601 ET SEQ), WHICH FORBIDS NATIONAL ORIGIN DISCRIMINATION IN THE RENTAL OF A DWELLING.

LEGAL ARGUMENT

WILMINGTON LODGE 470, B'NAI B'RITH, INC., INCORPORATED IN DELAWARE, IS NAMED AS OF THE OWNERS OF THE SUBJECT FACILITY, THE B'NAI B'RITH HOUSE, AND ACCORDING TO THE FACILITY'S MANAGER LYNNE ROTAN, UNDER OATH, IN DEPOSITION, ON NOVEMBER 4. (AT EXHIBIT A).

ADDITIONALLY, ACCORDING TO RETIREMENTHOMES.COM, WILMINGTON LODGE 470, B'NAI B'RITH, INC., IS THE OWNER OF THE B'NAI B'RITH HOUSE. (AT EXHIBIT B).

HENSE, PLAINTIFFS WISH TO ADD, AS "NO. 7", UNDER THE HEADING, PARTIES, AT PAGE 2 OF THEIR ORIGINAL COMPLAINT:

**7. DEFENDANT WILMINGTON LODGE 470, B'NAI B'RITH, INC. (INCORPORATED IN DELAWARE), WHOSE ADDRESS IS AT 8000 SOCIETY DRIVE, CLAYMONT, DE 19703.**

THEREFORE, THE AMENDED COMPLAINT WOULD READ:

\* \* \* \*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ISIDORE CORWIN AND BONNIE CORWIN  
*PLAINTIFFS,*

CIVIL ACTION NO.: **NO. 07-CV-152-\*\*\***

-AGAINST-

COMPLAINT  
(TRIAL BY JURY DEMANDED)

B'NAI B'RITH SENIOR CITIZEN HOUSING, INC.;  
WILMINGTON LODGE 470, B'NAI B'RITH INC.;  
SOUTHEASTERN PROPERTY MANAGEMENT, INC.;  
AND LYNNE ROTAN, AN AGENT, SERVANT OR EMPLOYEE OF  
B'NAI B'RITH SENIOR CITIZEN HOUSING, INC.

*DEFENDANTS.*

PLAINTIFFS ISIDORE CORWIN AND BONNIE CORWIN, PRO SE, UNDERSIGNED, BRING THIS COMPLAINT AGAINST THE ABOVE-NAMED DEFENDANTS AND THEIR AGENTS, SERVANTS, AND EMPLOYEES, AND IN SUPPORT THEREOF ALLEGE THE FOLLOWING ON PERSONAL KNOWLEDGE AS TO THEMSELVES

PARTIES

1. PLAINTIFF ISIDORE CORWIN ("I. CORWIN") IS A CITIZEN OF THE UNITED STATES AND RESIDES IN THE STATE OF DELAWARE AT 8608 SOCIETY DRIVE, CLAYMONT, COUNTY OF NEW CASTLE, DELAWARE, 19703.
2. PLAINTIFF BONNIE CORWIN ("B. CORWIN") IS A CITIZEN OF THE UNITED STATES, IS THE LAWFUL SPOUSE OF PLAINTIFF ISIDORE CORWIN, AND RESIDES WITH HIM AT 8608 SOCIETY DRIVE, CLAYMONT, COUNTY OF NEW CASTLE, STATE OF DELAWARE, 19703.

3. DEFENDANT B'NAI B'RITH SENIOR CITIZEN HOUSING, INC. ("B'NAI B'RITH SENIOR") HAS ITS PRINCIPAL PLACE OF BUSINESS AT 8000 SOCIETY DRIVE, CLAYMONT, DE, 19703, AND ITS CORPORATE OFFICE AT 1103 R. ARRINGTON, JR. BOULEVARD SOUTH, BIRMINGHAM, ALABAMA, 35205.

4. DEFENDANT SOUTHEASTERN PROPERTY MANAGEMENT, INC. ("SPM") IS A MANAGEMENT AGENCY, WITH ITS CORPORATE OFFICE AT 1103 R. ARRINGTON, JR. BOULEVARD SOUTH, BIRMINGHAM, ALABAMA, 35205.

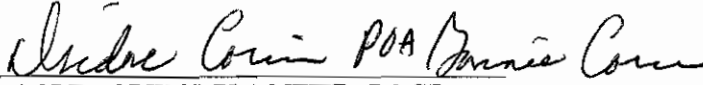
5. DEFENDANT LYNNE ROTAN ("ROTAN") IS A PROPERTY MANAGER, WITH HER RESIDENCE AT 15 PENNSYLVANIA AVENUE, CLAYMONT, DELAWARE, 19703.

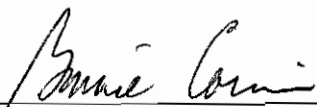
6. AT ALL TIMES RELEVANT TO THIS COMPLAINT, DEFENDANT ROTAN ACTED AS AN AGENT, SERVANT, OR EMPLOYEE OF B'NAI B'RITH SENIOR.

7. DEFENDANT WILMINGTON LODGE 470, B'NAI B'RITH INCORPORATED, OWNER OF B'NAI B'RITH HOUSE, WHOSE CORPORATION ADDRESS IS AT 8000 SOCIETY DRIVE, CLAYMONT, DE 19703.

\* \* \* \*

RESPECTFULLY SUBMITTED,

  
ISIDORE CORWIN, PLAINTIFF PRO SE  
B'NAI B'RITH HOUSE  
APT 608  
CLAYMONT, DE 19703-1749  
PHONE/FAX 302-798-5116

  
BONNIE CORWIN, PLAINTIFF PRO SE  
B'NAI B'RITH HOUSE  
APT 608  
CLAYMONT, DE 19703-1749  
PHONE/FAX 302-798-5116

DATED 5-9-07

EXHIBIT (A): 2-PAGE COPY OF U.S. DISTRICT COURT FOR THE DISTRICT OF DELAWARE DEPOSITION OF LYNN ROTAN ON NOVEMBER 4, 2005 AND PAGE 6 AT LINE 12.

EXHIBIT (B): 2-PAGE COPY OF HOMEPAGE OF RETIREMENTHOMES.COM PRINTOUT AND AT TOP OF PAGE 2, WHERE "OWNER" B'NAI B'RITH LODGE IS LISTED AS OWNER OF THE B'NAI B'RITH HOUSE.

CORWIN V. B'NAI B'RITH SENIOR ET AL

CASE NO. 07-152 \*\*\*

EXHIBIT A & B

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ISIDORE CORWIN and )  
BONNIE CORWIN, )  
 )  
Plaintiffs, )  
 ) Civil Action No.  
 ) 04-1499  
-vs- )  
 )  
B'NAI B'RITH SENIOR CITIZEN )  
HOUSING, INC., a corporation )  
d/b in the State of Delaware, )  
SOUTHEASTERN PROPERTIES )  
MANAGEMENT, INC., a )  
subsidiary of B'NAI B'RITH )  
SENIOR HOUSING, INC., and )  
LYNNE ROTAN, an agent, servant )  
or employee of SOUTHEASTERN )  
PROPERTIES MANAGEMENT, INC., )  
 )  
Defendants. )

Deposition of LYNNE ROTAN, taken before  
Elaine Gallagher Parrish, Registered Professional  
Reporter, at 1509 Gilpin Avenue, Wilmington, Delaware on  
November 4, 2005, commencing approximately at 9:00 a.m.

APPEARANCES:

CHRISTOPHER A. FERRARA, ESQ.  
AMERICAN CATHOLIC LAWYERS ASSOCIATION, INC.  
420 Route 46 East, Suite 7  
P.O. Box 10092  
Fairfield, New Jersey 07004-6092  
973-244-9895  
for the Plaintiffs,

WILCOX & FETZER  
1330 King Street - Wilmington, Delaware 19801  
(302) 655-0477



WILCOX & FETZER LTD.  
Registered Professional Reporters

ORIGINAL

1 issue a report and it says, you know, either you owe HUD  
2 for so much or -- we don't deal directly with HUD. We  
3 deal with the Delaware State Housing Authority.

4 Q. So the flow of the money goes which way? It  
5 goes from HUD to what?

6 A. I imagine it goes from HUD to Delaware State  
7 Housing Authority. I'm not really privy to that. The  
8 money goes from Delaware State Housing Authority to us.

9 Q. So the Delaware State Housing Authority pays the  
10 owners of the facility?

11 A. Yes.

12 Q. And the owner of the facility is the B'nai  
13 B'rith?

14 A. B'nai B'rith Wilmington Lodge. B'nai B'rith  
15 Senior Housing, Incorporated.

16 Q. Do you know who the officers of B'nai B'rith  
17 Senior Housing, Incorporated are: The president,  
18 vice-president and so forth?

19 A. The president is David Schlecker,  
20 S-c-h-l-e-c-k-e-r.

21 Q. And the vice-president, if you know?

22 A. The vice-president I believe is Stephen  
23 Scheinberg. S-t-e-p-h-e-n, S-c-h-e-i-n-b-e-r-g.

24 Q. Is there a secretary that you know of?



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## B'nai B'rith House Retirement Homes

Location :Claymont, Delaware

Address :8000 Society Dr 19703

Telephone :302-798-6846

Fax :302-798-2275

## Description:

### CONTACT

Lynne Rotan

### INDEPENDENT LIVING

Apts 208

Govt-subsidized

Min age 62

### SERVICES

Central dining

Housekeeping

Social and recreational

Social work/Mental health

Library

Religious activities

Maintenance

Emergency call system

### DATE OPENED

August 1979

### OWNER TYPE

Private non-profit

**OWNER**

B'nai B'rith Lodge #470

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IN AND FOR THE DISTRICT OF DELAWARE

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(INFORMA PAUPERIS STATUS)

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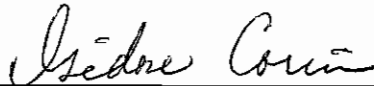

CIVIL ACTION

07-152  
NO. ~~04-1499~~-GMS  
JURY TRIAL DEMANDED

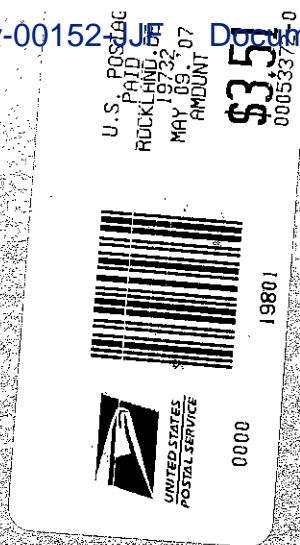
CERTIFICATE OF SERVICE

WE, ISIDORE AND BONNIE CORWIN, PRO SE, DO HEREBY CERTIFY THAT ON May 9, 2007, WE CAUSED THE ORIGINAL AND (1) COPY OF THE FOREGOING PLAINTIFFS' MOTION TO AMEND COMPLAINT TO BE FILED WITH THE CLERK OF THE COURT AND A COPY OF SUCH FILING WAS SERVED IN THE MANNER INDICATED UPON THE FOLLOWING PARTIES' COUNSEL OF RECORD:

BY FAX TO:  
ATTORNEY DANIEL GRIFFITH  
1220 N. MARKET  
WILMINGTON, DELAWARE  
FAX 302-651-7905

   
BY: ISIDORE & BONNIE CORWIN, PRO SE  
8608 SOCIETY DRIVE  
CLAYMONT, DELAWARE 18703  
PHONE/FAX: 302-798-5116

Mr. & Mrs. Isidore Corwin  
8608 Society Dr.  
Claymont, DE 19703-1749



*Peter Valleo, Clerk  
U.S. District Court  
844 N. King  
Lockbox "18" (Eighteen)  
Wilmington, DE 19801-3570*